From: Rodgers, James < James.Rodgers@clydeco.us>

Sent: Tuesday, April 1, 2025 5:05 PM

To: W. Ryan Snow <wrsnow@cwm-law.com>

Cc: James Chapman < <u>ichapman@cwm-law.com</u>>; Mackenzie Pensyl < <u>mpensyl@cwm-law.com</u>>; James

D. Crutchfield crutchfield@cwm-law.com>; Tressa Lucas <tlucas@cwm-law.com>; Zach Jett

Document 68-1

<zjett@butler.legal>; Mark Nanavati <mnanavati@snllaw.com>; Johnson, Dawn

<Dawn.Johnson@clydeco.us>; Cohen, Harry <Harry.Cohen@clydeco.us>; Roman, Michael

< Michael.Roman@clydeco.us>; Werner, Rachel < Rachel.Werner@clydeco.us>; Keating, Lourdes

<Lourdes.Keating@clydeco.us>; Alonzo, Jennifer <Jennifer.Alonzo@clydeco.us>; Rodgers, James

<James.Rodgers@clydeco.us>

Subject: RE: [External] Coeymans Marine Towing, LLC, et al, U.S.D.C., E.D.V.A., Civil Case No.: 2:24-CV-00490 [CC-US.980000.981028.FID1207794]

CAUTION External Email: This email originated from outside of the CWM network. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Ryan,

We will revert on Charleston dates.

Do you have mid to late April dates we can put to our structural expert? Please also confirm we can walk on the bridge.

Thanks, Jim

From: W. Ryan Snow <wrsnow@cwm-law.com>

Sent: Monday, March 31, 2025 5:06 PM

To: Rodgers, James < <u>James.Rodgers@clydeco.us</u>>

Cc: James Chapman <<u>jchapman@cwm-law.com</u>>; Mackenzie Pensyl <<u>mpensyl@cwm-law.com</u>>; James

D. Crutchfield <<u>jcrutchfield@cwm-law.com</u>>; Tressa Lucas <<u>tlucas@cwm-law.com</u>>; Zach Jett

<zjett@butler.legal>; Mark Nanavati <mnanavati@snllaw.com>; Johnson, Dawn

<Dawn.Johnson@clydeco.us>; Cohen, Harry <Harry.Cohen@clydeco.us>; Roman, Michael

< <u>Michael.Roman@clydeco.us</u>>; Werner, Rachel < <u>Rachel.Werner@clydeco.us</u>>; Keating, Lourdes

<Lourdes.Keating@clydeco.us>; Alonzo, Jennifer <Jennifer.Alonzo@clydeco.us>

Subject: RE: Coeymans Marine Towing, LLC, et al, U.S.D.C., E.D.V.A., Civil Case No.: 2:24-CV-00490 [CC-US.980000.981028.FID1207794]

Jim,

Do you have available dates for a tug inspection in Charleston as discussed?

We have confirmed availability for a bridge inspection in April or May, provided it occurs on a weekend and we get sufficient notice in advance to coordinate it. The inspection would be on the same terms as Carver's last inspection (safety briefing, PPE, and standard entry releases required). Ryan

W. Ryan Snow, Esquire

CRENSHAW, WARE & MARTIN, P.L.C. Celebrating 100 Years, 1923-2023 757-623-3000 www.cwm-law.com

From: Rodgers, James < James.Rodgers@clydeco.us>

Sent: Thursday, March 27, 2025 11:11 AM

To: Mackenzie Pensyl <mpensyl@cwm-law.com>

Cc: James Chapman <<u>jchapman@cwm-law.com</u>>; W. Ryan Snow <<u>wrsnow@cwm-law.com</u>>; Zach Jett

<zjett@butler.legal>; Mark Nanavati <mnanavati@snllaw.com>; Johnson, Dawn

<Dawn.Johnson@clydeco.us>; Cohen, Harry <Harry.Cohen@clydeco.us>; Roman, Michael

<Michael.Roman@clydeco.us>; Werner, Rachel <Rachel.Werner@clydeco.us>; Rodgers, James

<James.Rodgers@clydeco.us>; Keating, Lourdes <Lourdes.Keating@clydeco.us>; Alonzo, Jennifer

<Jennifer.Alonzo@clydeco.us>

Subject: [External] Coeymans Marine Towing, LLC, et al, U.S.D.C., E.D.V.A., Civil Case No.: 2:24-CV-00490 [CC-US.980000.981028.FID1207794]

CAUTION External Email: This email originated from outside of the CWM network. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Hi Mackenzie,

Please see attached response to your 3/21/25 letter.

If you have any questions, please give me or Mike Roman a call.

Regards, Jim

James Rodgers

Senior Counsel | Clyde & Co US LLP Direct Dial: +1 212 702 6771 | Mobile: +1 646 853 4277

The Chrysler Building | 405 Lexington Avenue | 16th Floor | New York | NY 10174 | USA Main +1 212 710 3900 | Fax +1 212 710 3950 | www.clydeco.us

If our account details change, we will notify these to you by letter, telephone or faceto-face and never by email.

This email message and any attachments may contain legally privileged and/or confidential information intended solely for the use of the individual or entity to whom it is addressed. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution or copying of this message or its attachments is strictly prohibited. If you have received this email message in error, please immediately notify us

Case 2:24-cv-00490-MSD-LRL Document 68-1 Filed 07/15/25 Page 3 of 3 PageID# 515

by telephone, fax or email and delete the message and all attachments thereto. Thank you. Clyde & Co US LLP is a Delaware limited liability law partnership affiliated with Clyde & Co LLP, a multinational partnership regulated by The Law Society of England and Wales.

Disclosure: To ensure compliance with requirements imposed by the IRS in Circular 230, we inform you that any tax advice contained in this communication (including any attachment that does not explicitly state otherwise) is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code or promoting, marketing or recommending to another party any transaction or matter addressed herein.

The contents of this e-mail message and any attachments are intended for the addressee(s) named in this message. This communication is intended to be and to remain confidential and may be subject to applicable attorney/client and/or work product privileges. If you are not the intended recipient of this message, or if this message has been addressed to you in error, please immediately alert the sender by reply e-mail and then delete this message and its attachments. Do not deliver, distribute or copy this message and/or any attachments and, if you are not the intended recipient, do not disclose the contents or take any action in reliance upon the information contained in this communication or any attachments.